

1 ORRICK, HERRINGTON & SUTCLIFFE LLP
2 AMY K. VAN ZANT (SBN 197426)
3 avanzant@orrick.com
4 JASON K. YU (SBN 274215)
5 jasonyu@orrick.com
6 TAMMY SU (SBN 329652)
7 tsu@orrick.com
8 1000 Marsh Road
Menlo Park, CA 94025-1015
Telephone: (650) 614 7400
Facsimile: (650) 614 7401

Craig J. Mariam (SBN: 225280)
cmariam@grsm.com
Anthony D. Phillips (SBN: 259688)
aphillips@grsm.com
Eunice J. Liao (SBN: 330655)
eliao@grsm.com
GORDON REES SCULLY MANSUKHANI, LLP
275 Battery Street, Suite 2000
San Francisco, CA 94111
Telephone: (415) 986-5900
Facsimile: (877) 306-0043

7 Attorneys for Plaintiff
TRADESHIFT, INC.

Attorneys for Defendant
BUYERQUEST, INC.

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 TRADESHIFT, INC., a Delaware corporation,
13 Plaintiff,
14 v.
15 BUYERQUEST, INC., an Ohio corporation,
16 Defendant.

Case No. 3:20-cv-1294-RS

**STIPULATION AND ORDER TO
MODIFY DISCOVERY
DEADLINES**

STIPULATION TO MODIFY DISCOVERY DEADLINES

Tradeshift, Inc. (“Tradeshift”) and BuyerQuest, Inc. (“BuyerQuest”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, the Court issued an Initial Case Management Order on June 2, 2020 (DE 36) identifying certain deadlines for fact discovery, expert reports, expert discovery, and dispositive motions;

WHEREAS, the parties have engaged and continue to engage in good faith conferrals regarding discovery disputes;

WHEREAS, the parties have submitted one discovery dispute to the Magistrate Judge for resolution and expect to submit at least one additional issue to the Magistrate Judge for resolution;

WHEREAS, the parties believe they will need additional time to resolve their discovery disputes and complete depositions and, as a result, have stipulated to a proposed revised schedule for completing discovery,

WHEREAS, the parties' proposed revised schedule will not alter the trial date in this case;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their respective counsel of record and subject to the approval of the Court, that the dates in the June 2, 2020 Initial Case Management Order shall be modified as follows:

Event	Current Deadline	New Deadline
Fact Discovery Cutoff	February 19, 2021	March 22, 2021
Opening Expert Reports	March 26, 2021	April 26, 2021
Rebuttal Expert Reports	April 23, 2021	May 24, 2021
Expert Discovery Cutoff	May 28, 2021	June 21, 2021
Dispositive Motion Hearing	August 5, 2021	No Change
Pretrial Conference	October 20, 2021	No Change
Trial	November 1, 2021	No Change

1 Dated: January 21, 2021

By: /s/ Amy K. Van Zant
AMY K. VAN ZANT
Attorneys for Plaintiff
TRADESHIFT, INC.

4 Dated: January 21, 2021

By: /s/ Anthony Phillips
ANTHONY PHILLIPS
Attorneys for Defendant
BUYERQUEST, INC.

7 **ATTESTATION**

8 I attest that, under Civil Local Rule (5-1)(i)(3), I have obtained concurrence in the filing of
9 this document from all Signatories.

10 _____
11 Amy K. Van Zant

12 **IT IS SO ORDERED**

14 Dated: January 21, 2021



15 _____
16 RICHARD SEEBORG
17 United States District Judge